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February 22, 2017

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Global Connection Inc. of America Amended Compliance Plan
WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On March 8, 2012, Global Connection Inc. of America (“Global Connection” or “Company”) submitted its Compliance Plan for wireless Lifeline services, outlining the measures it would take to implement the conditions imposed by the Federal Communications Commission (“FCC” or “Commission”) in its 2012 Lifeline Reform Order.¹ Following revisions, most recently on April 30, 2012, the Commission approved Global Connection’s wireless Compliance Plan on May 25, 2012.² Global Connection filed a Compliance Plan for its wireline Lifeline services on June 26, 2012, most recently revised on July 14, 2016. The Commission approved Global Connection’s wireline Compliance Plan on August 10, 2016.³

Global Connection now seeks expedited approval of the attached Amended Compliance Plan, which has been updated to: (1) reflect a proposed change in ownership of the Company; (2) include Global Connection’s wireless and wireline Lifeline services; and (3) update the information provided in the approved Compliance Plans due to the passage of time.

¹ See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (2012 Lifeline Reform Order).

² See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket. Nos. 09-197 and 11-42, Public Notice, DA 12-828 (rel. May 25, 2012).

³ *Wireline Competition Bureau Approves The Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Dckt. Nos. 09-197 and 11-42, (rel. August 10, 2016).

I. THE TRANSACTION

Global Connection is currently a wholly owned subsidiary of Global Connection Holdings Corporation (“Global Holdings”), a U.S. company whose principal place of business is located at 5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093. Global Holdings operates as a holding company for Global Connection and does not provide telecommunications services. The majority interest in Global Holdings is held by L6-Global LLC, a Georgia limited liability company. Through interests in L-6 Global LLC, approximately 71 percent (100% attributed) of the equity in Global Connection is ultimately held or controlled by Milestone Partners, a private equity firm based in Radnor, Pennsylvania.

Pursuant to the terms of a Stock Purchase Agreement dated February 16, 2017 (the “Agreement”), by and among Odin Mobile, LLC (“Odin Mobile”), Global Holdings and Global Connection (collectively, the “Parties”), and following regulatory approvals,⁴ Odin Mobile will acquire seventy five percent (75%) of the stock in Global Connection, which will become a majority owned direct subsidiary (the “Transaction”). Ultimate (indirect) control of Global Connection will be transferred to the ninety-nine percent (99%) interest holder in Odin Mobile, Paul Greene, a United States citizen. Global Holdings will retain minority interest in Global Connection (twenty five percent (25%)).⁵

Odin Mobile is a Maryland limited liability company with its principal offices located at 11565 Old Georgetown Road, Rockville, Maryland 20852. Odin Mobile provides wireless services to consumers through the purchase of wireless network infrastructure and wireless transmission facilities from T-Mobile USA (“T-Mobile”) on a wholesale basis. Odin Mobile and its affiliates have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth. The ninety-nine percent (99%) owner of Odin Mobile, Paul Greene, is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Wholesale, LLC (“PPWW”), a Maryland limited liability company. PPWW is one of the nation’s longest standing aggregators of wireless services. PPWW is financially strong, carrying zero debt or outside investment. PPWW provides integrated communications solutions - including Mobile Virtual Network Operator (“MVNO”) enablement, cellular carrier access aggregation, voice/text/data services, machine-to-machine (“M2M”), and Internet of Things (“IoT”) connectivity. PPWW owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure, and has a long-term contractual and network relationship with T-Mobile. PPWW’s network infrastructure and T-Mobile relationship enables PPWW to leverage equipment, connectivity, software, and expertise to deliver a complete package of carrier-grade telecommunication enablement services to the US MVNO market.

⁴ Global Connection filed its Domestic and International Section 214 Application for Transfer of Control on February 22, 2017.

⁵ The Transaction will not result in any change to the ownership of Global Holdings. Majority direct interests in Global Holdings will continue to be held by L6-Global. Milestone Partners will continue to hold ultimate control of Global Holdings.

The Transaction will demonstrably serve the public interest by bringing the managerial, technical, and financial resources available through Odin Mobile and its affiliates to Global Connection. The Transaction will advance economic efficiency by enabling Global Connection to expand its business and achieve economies of scale, strengthening Global Connection's ability to expand its offerings and services to a broader customer base. Of particular benefit, Global Connection's current management team will remain with the Company, continuing to direct day-to-day operations. This will ensure that their expertise in the telecommunications field and specific in-depth knowledge of Global Connection will guide the Company's decisions going forward. As a result, the Transaction will bring together the full strength of Global Connection's proven telecommunications capabilities and the technical, managerial and financial expertise of Odin Mobile and its affiliates. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies—both necessary components for the Company to thrive.

The Transaction will be seamless and transparent to Global Connection's customers, and in no event will it result in the discontinuance, reduction, loss, or impairment of service to customers. All existing customers of Global Connection will continue to be served by Global Connection pursuant to its existing authorizations, and will continue to receive their existing services at the same rates, terms and conditions as at present. Details of the Transaction, including the new ownership structure and discussion of the financial and technical resources of the new ownership and the public interest benefits of the Transaction are provided in footnote 1 on page 1, page 3, and Section III (pp. 25-29) of the Amended Compliance Plan.

II. CURRENT WIRELESS AND WIRELINE OPERATIONS

As discussed in the Amended Compliance Plan, Global Connection currently provides wireless service in twenty-four (24) territories and prepaid wireline local exchange and long distance services to residential customers in twenty (20) states. The Company is designated as an eligible telecommunications carrier ("ETC") to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states, and on a wireless basis in all twenty-four (24) of its wireless service territories. The Amended Compliance Plan combines the FCC-approved wireless and wireline Compliance Plans into one document, and updates the information to comply with current Lifeline regulations.

III. COMPLIANCE PLAN UPDATES DUE TO THE PASSAGE OF TIME

The Amended Compliance Plan has been revised to update the details of Global Connection's wireless and wireline operations and Lifeline ETC designations (p. 3) and financial and technical capability (Section III, pages 25-31). It also incorporates revisions to Company procedures and commitments throughout to reflect changes to Lifeline program rules since May 2012 (most notably, recent changes set forth in the Third Report and Order⁶). The following

⁶ See *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) ("Third Report and Order").

information was largely updated in the approved wireline Compliance Plan, and is updated in regards to the approved wireless Compliance Plan: updates regarding enrollment processes (pages 8-9); compliance with the rule requiring retention of proof of eligibility documentation (page 11); a description of how the Company “deals directly” with applicants (page 12); commitment to de-enroll customers at their request within two business days (page 13); updates to annual recertification practices, including sending educational messages about the recertification requirement (page 17); description of how the Company interacts with the National Lifeline Accountability Database (page 19); elimination of language due to the phase out of the in-depth validation (IDV) process⁷; compliance with the FCC Form 497 snapshot rule for reimbursements, as well as updated references for annual ETC filing requirements (page 22); and updates to Lifeline service offerings (Section II, pages 23-25) in accordance with the new minimum service standards. Further, the discussions of enrollment and eligibility determination procedures in Section I.B have been updated and expanded. Current exhibit materials for the Company’s wireless and wireline Lifeline operations (marketing materials, sample enrollment form, income eligibility worksheet) are also included.

IV. CONCLUSION

Global Connection respectfully request that the Commission expeditiously approve its Amended Compliance Plan, to ensure that Global Connection is able to continue providing low-income consumers throughout its operating territories with high-quality wireless Lifeline offerings and, at a time when available Lifeline plans are increasingly provided via wireless technologies, wireline-based Lifeline services as well.

Please feel free to contact the undersigned if there are any questions regarding this filing.

Respectfully submitted,

s/ Lance J.M. Steinhart

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Attachment

cc: Ryan Palmer

⁷ The language regarding cooperating with in-depth validation audits was on page 19-20 of the approved wireless Compliance Plan.

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Global Connection Inc. of America	

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of these revisions to its approved Compliance Plans (“Amended Compliance Plan”) outlining the measures it will take to comply with the Commission’s Lifeline rules and implement the conditions imposed by the Federal Communications Commission (“Commission” or “FCC”) in its 2012 Lifeline Reform Order and 2015 Lifeline Second Report and Order for its wireless and wireline service,² as

¹ Global Connection hereby reports its corporate and trade names, and identifiers, for its wireless service as Stand Up Wireless (dba) and for its wireline service as Real Home Phone (trade name). The Company reports its holding company as Global Connection Holdings Corporation (“Global Holdings”). Global Connection has no separate operating companies and no affiliates. Following the change in Global Connection’s majority ownership proposed herein, the Company’s corporate and trade names, and identifiers will remain unchanged and it will continue to have no separate operating companies; however, it will be affiliated with Odin Mobile, LLC, and have the following indirect telecommunications affiliates through Paul Greene’s ownership interest: Prepaid Wireless Wholesale, LLC, which is a wholesale provider of wireless telecommunications services; and Cintex Wireless, LLC, which is a retail provider of Lifeline and non-Lifeline prepaid wireless services in Arkansas, Maryland, Maine, Rhode Island and West Virginia, and a wholesale provider of wireless telecommunications services.

² See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012)

well as the measures it will take to comply with Commission's Third Report and Order.³ On March 8, 2012, Global Connection filed a Compliance Plan for its wireless service, followed by revisions most recently on April 30, 2012. Global Connection's wireless Compliance Plan was approved by the Wireline Competition Bureau ("Bureau") on May 25, 2012.⁴ On June 26, 2012, Global Connection filed a Compliance Plan for its wireline service, which was most recently revised and re-filed on July 14, 2016. Global Connection's wireline Compliance Plan was approved by the Bureau on August 10, 2016.⁵ Global Connection files this Amended Compliance Plan to incorporate Global Connection's wireless and wireline Lifeline services, and to update the information provided herein due to the passage of time. Global Connection has a Petition for Eligible Telecommunications Carrier ("ETC") Designation in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia ("ETC Petition") pending at the Commission, and requests that, concurrent with

(2012 Lifeline Reform Order). *See Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) (Second Report and Order, Order on Reconsideration or Lifeline Second FNPRM). The Company herein submits the information required by the Compliance Plan Public Notice. *See Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012) (Compliance Plan Public Notice).

³ *See In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*Third Report and Order*").

⁴ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

⁵ *Wireline Competition Bureau Approves The Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Dckt. Nos. 09-197 and 11-42, (rel. August 10, 2016).

Commission grant of this Amended Compliance Plan, the Commission also approve its Pending Amended ETC Petition.⁶

Global Connection provides wireless service in twenty-four (24) territories⁷ and prepaid wireline local exchange and long distance services to residential customers in twenty (20) states.⁸ The Company is designated as an eligible telecommunications carrier (“ETC”) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states,⁹ and on a wireless basis in all twenty-four (24) of its wireless service territories. Global Connection currently provides wireline Lifeline service to approximately 4,400 subscribers and approximately 13,000 prepaid wireline customers.

Change in Ownership of Global Connection

As noted above, Global Connection is currently wholly-owned by Global Holdings. As described in Section III below, Global Holdings and Odin Mobile, LLC (“Odin Mobile”) have entered into an agreement pursuant to which Odin Mobile will acquire seventy five percent (75%)

⁶ See, *Petition of Global Connection Inc. of America. For Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia* (“ETC Petition”) WC Docket No. 09-197, filed April 4, 2012. This ETC Petition was subsequently amended on February 26, 2013 to update it in light of the Commission’s rule changes affecting Lifeline-only ETCs. Global Connection still seeks Lifeline-only designation for which the Commission is the proper designating authority, because the states lack the authority to perform such designation for wireless telecommunications service providers seeking designation.

⁷ Those twenty-four territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

⁸ Those twenty states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Missouri, Mississippi, North Carolina, Ohio, Oklahoma, South Carolina, Tennessee, Texas, and Wisconsin. Global Connection is also certified but not yet providing services in Minnesota, Nebraska, New Mexico, Oregon, Washington, and West Virginia. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

⁹ Those twelve states are: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

of the direct stock interest in Global Connection. Ultimate (indirect) control of Global Connection will be transferred to the ninety-nine percent (99%) interest holder in Odin Mobile, Paul Greene, a United States citizen. Global Holdings will retain minority direct interest in Global Connection (twenty five percent (25%)). The transaction will not result in any loss or impairment of service for any customer.

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Global Connection complies with 911 requirements as described below and qualifies for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act to participate as an ETC in the Lifeline program.¹⁰

Global Connection complies fully with all conditions set forth in the 2012 Lifeline Reform Order and Third Report and Order, as well as with the Commission's Lifeline rules and policies more generally.¹¹ This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes in detail the measures that Global Connection takes to implement the obligations contained in the 2012 Lifeline Reform Order and Third Report and Order, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber

¹⁰ See 2012 Lifeline Reform Order ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund, including in any state where the public utilities commission determines that Global Connection provides service using its own facilities for purposes of a state universal service program.

¹¹ Global Connection will update its associated Lifeline program forms and advertising, whenever necessary, to reflect Commission changes to the applicable Lifeline program rules.

from the Low Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

ACCESS TO 911 AND E911 SERVICES¹²

Pursuant to the 2012 Lifeline Reform Order, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its wireless Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of wireless Lifeline-eligible subscribers who obtain Lifeline-supported services.¹³ The Company also complies with the Commission's 911 and E911 requirements for its wireline services; however, the handset requirement is not applicable to Global Connection's wireline services. The Company will provide its wireless Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all of the Company's wireless customers will have available access to emergency calling services at the time that Lifeline voice telephony service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining. All of the Company's wireline customers will have available access to emergency calling services at the time that Lifeline service is initiated. This 911 and E911 access will be available to those using the Company's services at all times until service is disconnected.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint, Verizon Wireless, AT&T and T-Mobile as its

¹² See Compliance Plan Public Notice at 3.

¹³ See 2012 Lifeline Reform Order ¶ 373.

underlying network providers/carriers for its wireless services and AT&T, CenturyLink, Windstream, Verizon and Frontier West as its underlying network providers/carriers for its wireline services. For both its wireless and wireline Lifeline services, Global Connection's underlying network providers/carriers route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers.

For the Company's wireless service, to the extent that Global Connection's underlying providers/carriers are certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. For the Company's wireless voice telephony service, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection's handsets used in connection with the wireless Lifeline service offering have always been and will continue to be 911 and E911-compliant. The Company's phones have passed a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing wireless customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in Global Connection's Lifeline voice telephony service is assured of receiving a 911/E911-compliant handset as well, free of charge. As discussed above, this requirement does not apply to Global Connection's wireline services.

To further obtain the benefits of a modernized Lifeline program, the Commission's Third Report and Order also set forth the requirement that Lifeline providers providing both mobile

broadband services and devices to their consumers provide handset devices that are Wi-Fi enabled.¹⁴ The Commission further requires such providers to offer the choice to Lifeline customers of devices that are equipped with hotspot functionality.¹⁵ To the extent Global Connection offers supported broadband service to consumers, it commits to provide handset devices that are Wi-Fi enabled as well as the choice to consumers to acquire devices that are equipped with hotspot functionality as outlined in the Third Report and Order.¹⁶

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE¹⁷

A. Policy

Global Connection will comply with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as amended by and through the Third Report and Order, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below one hundred-thirty five percent (135%) of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in sections 54.409 of the Commission's rules. In addition, through the certification requirements described below and the use of the National Lifeline Accountability Database ("NLAD"), the Company

¹⁴ See Third Report and Order at ¶ 366.

¹⁵ See *id.* The Third Report and Order clarifies that the requirement to provide Wi-Fi-enabled handsets does not apply to Global Connection devices provided prior to the effective date of the rule (December 2, 2016).

¹⁶ See Third Report and Order at ¶ 378. See also 47 C.F.R. § 54.408(f)

¹⁷ See Compliance Plan Public Notice at 3.

confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

For both wireless and wireline Lifeline services, customers can enroll in person by calling Global Connection's customer service center or online. For the Company's wireless service, more than ninety percent (90%) of customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet.

Global Connection currently uses the CGM, LLC Lifeline enrollment application – which is currently used by dozens of ETCs – for its in-person wireless Lifeline customer enrollments. The CGM Lifeline enrollment application works on a tablet or computer and provides the required disclosures, and collects applicant information, identity documentation (where requested by the ETC or necessary for NLAD third-party identity verification (TPIV) dispute resolutions), and proof of eligibility. It also requires applicants to make the required certifications for Lifeline service. The application will then check any available state or federal eligibility databases, Global Connection's designated service territory in the state, underlying carrier coverage area and conduct the NLAD duplicate check.

Approximately forty percent (40%) of the Company's wireline customer enrollment is done in-person at store locations that sell Global Connection services, as opposed to over the phone or the Internet. Global Connection currently has nearly five hundred (500) active agent locations, generally at retail locations such as convenience and check cashing stores.¹⁸ All agents enrolling Lifeline customers for Global Connection have a portal login, which allows them to enroll customers and provide the required disclosures, collect the required information and receive the

¹⁸ Global Connection does not enroll wireline Lifeline applicants at mobile enrollment events at this time, but may do so in the future.

required certifications as set forth in the Company's Lifeline application/certification form. The applicant populates the application form with the assistance of the agent as necessary or requested, which is then printed for the applicant's review, signature and date. The enrolling agent is then required to fax or email the application and proof of eligibility to Global Connection for review as discussed in further detail below.

At such enrollment events and store locations, Global Connection requires all prospective customers to show a valid government-issued photo identification¹⁹ and the address is checked against the E911 database to clear service from Global Connection's underlying providers. Each prospective customer is checked against the NLAD to ensure that the applicant does not already receive Lifeline service before the customer is enrolled.²⁰

Wireless and wireline customers that enroll by calling Global Connection's customer service number are sent an application/certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility. Customers may also complete the Certification form through our Lifeline Interactive Voice Response Line and following the prompts. Customers will either fax, email or mail their eligibility proof and copy of government-issued identification.

Finally, customers can also enroll online by completing and printing an application to sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility.

As discussed in further detail in Section I.F. below, all employees or agents (Company personnel) that conduct in-person enrollments are trained regarding the eligibility and certification

¹⁹ Any identification documentation collected, including documentation used in NLAD processes to verify identity are now retained pursuant to the Order on Reconsideration. *See* Order on Reconsideration ¶ 224, *supra* n. 2 at p. 4.

²⁰ *See infra* Section I.F. regarding use of the NLAD.

requirements in the 2012 Lifeline Reform Order, Third Report and Order, and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases (including the National Verifier, once in place), Company personnel, who are non-commissioned employees, will review documentation establishing eligibility pursuant to the Lifeline rules.²¹ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal income-based and/or program-based criteria set forth in 47 C.F.R. § 54.409. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the Commission's rules.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.²² Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying assistance program; (2) a notice or letter of participation in a qualifying assistance program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document demonstrating that the prospective subscriber, one or more of the

²¹ See 2012 Lifeline Reform Order ¶ 100; *Third Report and Order* at ¶ 416. 47 C.F.R. § 54.410(b)(1)(i)(B), 47 C.F.R. § 54.410(c)(1)(i)(B).

²² See 2012 Lifeline Reform Order ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/>.

prospective subscriber's dependents or the prospective subscriber's household receives benefits from a qualifying assistance program.²³

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months' time.²⁴ If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.²⁵

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.²⁶ In addition, Company personnel will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. The Company complies with the requirement to retain and protect proof of eligibility.²⁷ Where Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the

²³ See 47 C.F.R. § 54.410(c)(1)(i)(B). See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/program-eligibility.aspx>

²⁴ See 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁵ See *id.*

²⁶ See 2012 Lifeline Reform Order ¶101; 47 C.F.R. § 54.410(b)(1)(iii), 47 C.F.R. § 54.410(c)(1)(iii).

²⁷ See Order on Reconsideration ¶ 221 *supra* n. 2 at p.4; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel. In addition, a Global Connection employee will be responsible for overseeing and approving every Lifeline application prior to enrolling the applicant for Lifeline service and including that customer on an FCC Form 497 for reimbursement.

Further, Global Connection will not enroll customers at retail locations where Global Connection does not have an agency agreement with the retailer. Global Connection will require an agent retailer to have any employees involved in the enrollment process go through the standard Global Connection training process, just as it would for any other Company personnel. By establishing agency relationships with all of its Company personnel, including future retail outlets, Global Connection meets the "deal directly" requirement adopted in the TracFone Forbearance Order.²⁸

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[l]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"²⁹ Global Connection is responsible for the actions of all of its employees and agents, including those enrolling customers in any Global Connection owned or affiliated retail locations, and a non-commissioned Global Connection employee will be responsible for overseeing and finalizing every Lifeline application prior to approving the application and including that customer on an FCC Form 497 for reimbursement. The Company will therefore always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

²⁸ See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order, FCC 05-165, ¶ 19 (2005).

²⁹ 2012 Lifeline Reform Order ¶ 110.

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing, will comply with any state dispute resolution procedures applicable to Lifeline termination, and will give the subscriber thirty (30) days to demonstrate continued eligibility.³⁰ A demonstration of eligibility must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form.

As required by the Commission's rules, if a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within two (2) business days.³¹ Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Wireline customers can call customer service by dialing 1-877-511-3009 and wireless customers can call customer service by dialing 1-800-544-4441. Live customer service and bilingual operators can currently be reached for wireline Lifeline service support from 8:30 AM to 6:00 PM Eastern, Monday through Friday, excluding holidays, and for wireless Lifeline service support, from 8:30 AM to 7 PM Eastern, Monday through Friday, and 10 AM to 2 PM Eastern on Saturday, excluding holidays.

C. Subscriber Certifications for Enrollment

Global Connection has implemented certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the 2012 Lifeline Reform Order, together with any additional state certification requirements.³²

³⁰ See 2012 Lifeline Reform Order ¶ 143; 47 C.F.R. § 54.405(e)(1).

³¹ See 47 C.F.R. § 54.405(e)(5).

³² 2012 Lifeline Reform Order ¶ 61; 47 C.F.R. § 54.410(a).

The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.³³ Applicants that seek to enroll based on income eligibility can do so through the electronic enrollment application or will be referred to a worksheet showing the Federal Poverty Guidelines by household size.³⁴ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will orally explain the certifications to consumers when they are enrolling in person or over the phone.³⁵

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6)

³³ See Model Application/Certification Forms, included as **Exhibit A**. See Compliance Plan Public Notice at 3.

³⁴ See Income Eligibility Worksheets, included as **Exhibit B**.

³⁵ See 2012 Lifeline Reform Order ¶ 123.

Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.³⁶

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.³⁷

Information Collection. The Company also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient³⁸); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.³⁹

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,⁴⁰ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company

³⁶ See *id.* ¶ 121; 47 C.F.R. § 54.410(d)(1).

³⁷ See 47 C.F.R. § 54.405(c).

³⁸ See 2012 Lifeline Reform Order ¶ 87.

³⁹ See 47 C.F.R. § 54.410(d)(2).

⁴⁰ See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

within thirty (30) days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within thirty (30) days; (5) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (6) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (7) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (8) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.⁴¹ The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.⁴²

⁴¹ See 2012 Lifeline Reform Order ¶¶ 168-196; 47 C.F.R. § 54.419.

⁴² See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See 47 C.F.R. § 54.404(b)(9).

D. Annual Verification Procedures

Global Connection annually re-certifies all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.⁴³ Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.⁴⁴

Verification De-Enrollment. Global Connection de-enrolls subscribers that do not respond to the annual verification or fail to provide the required certification.⁴⁵ The Company sends a single written notice explaining that failure to respond to the re-certification request within sixty (60) days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the sixty (60) days, the Company de-enrolls the subscriber within five business days after the expiration of the subscriber's time to respond to the re-certification efforts.⁴⁶

⁴³ See 2012 Lifeline Reform Order ¶ 120.

⁴⁴ See 2012 Lifeline Reform Order ¶ 145.

⁴⁵ See revised 47 C.F.R. § 54.54.405(e)(4).

⁴⁶ Global Connection also sends messages to its customers to educate them regarding the annual recertification process and requirement, as contemplated by the 2012 Lifeline Reform Order. This type of educational recertification message is consistent with the 2012 Lifeline Reform Order, which states that "ETCs and states may also choose to notify subscribers about the re-certification requirements in their Lifeline outreach materials. By taking these actions, ETCs and states will ensure that consumers are aware of the importance of responding to re-certification efforts, and that they are not inadvertently disconnected due to a lack of understanding of program rules." 2012 Lifeline Reform Order ¶ 145.

E. Activation and Non-Usage

For the Company's wireless Lifeline service, Global Connection will not consider a wireless prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.⁴⁷ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

In addition, after service activation, Global Connection will not seek reimbursement from the USF for and will de-enroll any subscriber that has not used Global Connection's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), Global Connection will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Global Connection will update the NLAD within one (1) business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁸

⁴⁷ See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.407(c)(1).

⁴⁸ See 2012 Lifeline Reform Order at ¶ 257; *see also* 47 C.F.R. §§ 54.404(b)(10) and 54.405(e)(3), respectively.

Global Connection's wireline service offerings are prepaid and the Company assesses and collects a monthly fee from each wireline subscriber. Customers often make payments in person at Global Connection store locations. Therefore, Global Connection's wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.⁴⁹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

Database. The Company complies with the requirements of the NLAD and section 54.404 of the Commission's rules. As such, the Company queries the NLAD for every enrollment⁵⁰ to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.⁵¹

In addition to checking the NLAD, Company personnel emphasize the "one Lifeline phone per household" restriction in their direct sales contacts with potential customers. Training

⁴⁹ See 2012 Lifeline Reform Order ¶¶ 257, 263; 47 C.F.R. § 54.407(c).

⁵⁰ With the limited exception of states that have opted out of the NLAD. In those states, Global Connection will query the state duplicates database.

⁵¹ See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. *See id.*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber's information in the NLAD within ten (10) business days of any change, except for de-enrollment, which will be transmitted within one business day. *See* 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All customer-facing employees and agents must demonstrate understanding of the Commission's and Global Connection's rules and policies by completing the Company's Lifeline training and passing a Company issued exam. The training will be updated as needed, and will be reviewed no less frequently than every ninety (90) days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters for its wireless and wireline Lifeline service offerings.

One-Per-Household Certification. Global Connection has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household⁵² through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁵³ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's

⁵² A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. *See* 2012 Lifeline Reform Order ¶ 74; section 54.400(h).

⁵³ *See* 2012 Lifeline Reform Order ¶ 78.

income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁵⁴

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and the ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that not all Lifeline services are currently marketed under the name Lifeline.

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).⁵⁵ These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.⁵⁶ This specifically includes the Company's website for its wireless service (www.StandUpWireless.com) or wireline service (www.ConnectWithGlobal.com) as well as outdoor signage.⁵⁷ Samples of the Company's marketing materials are included as **Exhibit C**. In addition, the Company's application/certification forms will state that consumers who willfully make a false statement in

⁵⁴ *Id.* The USAC Household Worksheet is available at <http://www.lifelinesupport.org/ls/eligibility/default.aspx#household>.

⁵⁵ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁶ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁷ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

G. Company Reimbursements from the Fund

To ensure that Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁸ Further, the Company will comply with the Commission's requirement to use a first day of the month uniform snapshot date to request reimbursement from USAC for the provision of Lifeline support.⁵⁹ In addition, the Company will keep accurate records as directed by USAC⁶⁰ and as required by section 54.417 of the Commission's rules.

H. Annual Company Certifications

The Company submits an annual FCC Form 481 filing to the Commission by July 1st of each year, providing the Company's business and affiliate information, terms and conditions of any voice telephony plans offered to Lifeline subscribers, and all other required information and certifications.⁶¹ The Company also submits an annual Form 555 filing to the Commission certifying, under penalty of perjury, that the Company: (1) has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services; (2) that the Company is in compliance with all federal Lifeline certification procedures; and (3) that the Company is in

⁵⁸ See *2012 Lifeline Reform Order* ¶ 128; 47 C.F.R. § 54.407(d).

⁵⁹ See 47 C.F.R. § 54.407(a). Global Connection notes, however, that a number of ETCs filed a Petition for Reconsideration regarding the snapshot, which remains pending with the Commission. See *Wireless ETC Petitioners' Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 13, 2015).

⁶⁰ See 47 C.F.R. § 54.407(e).

⁶¹ See 47 C.F.R. § 54.422.

compliance with the minimum service levels set forth in 47 C.F.R. §54.408.⁶² The Company provides the results of its re-certification efforts, performed pursuant to section 54.410(f) of the Commission's rules, as amended, annually by January 31st, for its re-certification efforts of the previous year.⁶³

II. Description of Lifeline Service Offerings⁶⁴

Global Connection will offer its prepaid wireless and wireline Lifeline service in the study areas in the states where it is designated as an ETC⁶⁵ and throughout the coverage area of its respective, underlying provider(s). Global Connection's Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408.

Global Connection has revised its Lifeline plans as of December 2, 2016 to comply with the applicable minimum standards set by the Commission. The Company's current wireless Lifeline offering consists of the following plan options:

	PLAN DESCRIPTION	VOICE	TEXT	DATA (MB)	RETAIL	LIFELINE PRICE
1	Free 500 Voice/100 Text/ 50 MB Data	500	100	50	\$12.75	\$0.00
2	500 Voice & 500 MB Data	500	1:1*	500	\$22.50	\$9.75
3	500 Voice/2000 Text/100 MB	500	2000	100	\$24.95	\$12.20
4	Unlimited Talk/Text & 500 MB Data	Unlimited	Unlimited	500	\$39.95	\$27.20

* 1 Text = 1 Minute

⁶² See 47 C.F.R. § 54.416(a).

⁶³ See 47 C.F.R. § 54.416(b).

⁶⁴ See Compliance Plan Public Notice at 3.

⁶⁵ Global Connection is currently designated as a wireline ETC in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

In addition to allotments of voice, text and broadband services, Global Connection's current wireless Lifeline offering includes a free handset and access to custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All wireless Lifeline plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Lifeline customers can purchase additional bundles of minutes, currently in denominations of \$5 (200 minutes), \$10 (450 minutes), \$20 (1000 minutes), \$30 (1500 minutes) and \$50 (2500 minutes). Airtime "top-up" minutes are available for purchase through customer service and on its website. Additional information regarding the Company's wireless Lifeline plans, rates and services can be found on its website www.StandUpWireless.com.

The Company's wireline Lifeline offerings vary based on the Company's underlying provider. Where Global Connection resells AT&T service, the Company offers a Lifeline-discounted Basic Package⁶⁶ for \$20.70,⁶⁷ an Advantage Package⁶⁸ for \$25.70 and a Premium Package⁶⁹ for \$30.70 to eligible Lifeline customers. Where Global Connection resells CenturyLink and Level 3 service, the Company offers a Lifeline-discounted Basic Package⁷⁰ for \$32.95 and an Advantage Package⁷¹ for \$49.95 to eligible Lifeline customers. Where Global Connection resells Windstream service, the Company offers a Lifeline-discounted Basic Package⁷²

⁶⁶ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁶⁷ That rate, and all rates provided in this section, reflect the Lifeline discount.

⁶⁸ The Advantage Package adds the following to the Basic Package: Caller ID, Call Waiting and 100 minutes of domestic long distance.

⁶⁹ The Premium Package adds the following to the Advantage Package: Three-Way Calling, Call forwarding, Repeat Dial, Call Selector, Call Block and Call Return.

⁷⁰ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷¹ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷² The Basic Package includes unlimited local calling, 911 and a published phone number.

for \$36.70 and an Advantage Package⁷³ for \$46.70 to eligible Lifeline customers. Finally, where Global Connection resells Verizon and Frontier West services, the Company offers a Lifeline-discounted Basic Package⁷⁴ for \$36.70 and an Advantage Package⁷⁵ for \$46.70 to eligible Lifeline customers. Global Connection has resale agreements with each of these underlying providers for local exchange services. For example, Global Connection purchases Local Wholesale Complete services (UNE) from AT&T.

Customers of any wireline service package can purchase 250 domestic long-distance minutes for \$5.00 or unlimited domestic long-distance for \$10.00. Additional information regarding the Company's plans, rates and services can be found on its website www.ConnectWithGlobal.com.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷⁶

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷⁷ Because Global Connection is seeking to have its pending ETC Petition, as amended, granted in tandem with the Commission's grant of this Amended Compliance Plan, Global Connection will demonstrate that it is financially and technically able to completely comply with all of the Commission rules governing Lifeline ETCs. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier

⁷³ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁴ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁵ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁶ See Compliance Plan Public Notice at 3.

⁷⁷ See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates substantial revenues from non-Lifeline services which represent seventy-five percent (75%) of its wireline customers. Consequently, to date, Global Connection has not relied (and does not rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In addition, Global Connection has access to capital from its investors. Currently, through its interests in Global Holdings, the majority investor in Global Connection is Milestone Partners, a Pennsylvania private equity firm. Further, as explained below, financial support will continue to be available to Global Connection through the new majority ownership proposed for the Company.

Pursuant to the terms of a Stock Purchase Agreement ("Agreement") dated February 16, 2017, by and among Odin Mobile, Global Holdings and Global Connection, Odin Mobile will acquire seventy five percent (75%) of the stock in Global Connection, which will become its majority-owned direct subsidiary. A majority (ninety-nine percent (99%)) interest in Odin Mobile (and thus, the majority indirect interest in Global Connection) will be held post-close by Paul Greene, a U.S. citizen. Global Holdings will retain twenty five percent (25%) ownership of Global Connection.⁷⁸

Odin Mobile (FRN: 0022135131) is a Maryland limited liability company with its principal offices located at 11565 Old Georgetown Road, Rockville, Maryland 20852. Odin Mobile provides prepaid wireless telecommunications services to consumers by using the T-Mobile USA

⁷⁸ The transaction will not result in any change to the ownership of Global Holdings or Odin Mobile.

(“T-Mobile”) wireless network. The underlying carrier provides wholesale capacity on their wireless network to resellers like Odin Mobile. Odin Mobile purchases wireless services (for voice minutes, text messages, mobile data, etc.) from its underlying carrier on a wholesale basis, packages those services into Odin Mobile’s own service plans and pricing, and bundles the wireless service with Odin Mobile’s handset selection, mobile applications, marketing materials, web interface, and customer service to produce finished wireless service offerings to sell to end-user customers. Odin Mobile obtained its wireless identification registration (WIR) from the California Public Utilities Commission (“CPUC”) on June 2, 2015. Odin Mobile currently has an application pending with the CPUC to offer California Lifeline wireless service.⁷⁹ Odin Mobile and its affiliates have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth.

Paul Greene is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Wholesale, LLC (“PPWW”), a Maryland limited liability company. PPWW has no foreign ownership and, like Global Connection, is not a foreign carrier and is not affiliated with foreign carriers in any market. PPWW is one of the nation’s longest standing aggregators of Wireless Services. PPWW is financially strong, carrying zero debt or outside investment. PPWW participates in the Lifeline consortium to lobby for favorable rules, regulations that promote longevity and stability of the program.

PPWW provides integrated communications solutions - including Mobile Virtual Network Operator (MVNO) enablement, cellular carrier access aggregation, voice/text/data services, machine-to-machine (M2M), and Internet of Things (IoT) connectivity. PPWW helps companies deploy cellular services to their customers. These MVNOs market and sell while PPWW provides

⁷⁹ See CPUC Utility Number U-4481-C Advice Letter 2 filed on August 21, 2015.

backend network connectivity, billing, rating, handset logistics, call center and other enablement services necessary to execute their business objectives.

PPWW owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. These carrier-connected network elements are the hub of PPWW's business. When voice, text, or data events are initiated, those events are passed to PPWW's network for event approval, dynamic call routing, live event rating, billing, and reporting. PPWW has a long-term contractual and network relationship with T-Mobile USA, Inc. (NASDAQ: "TMUS"). Specifically, PPWW network elements are inter-connected with TMUS and TMUS leverages PPWW as an MVNO, M2M, and IoT aggregator. Specifically, PPWW's network infrastructure and TMUS relationship enables PPWW to leverage equipment, connectivity, software, and expertise from each partner to deliver a complete telecommunication solution.

PPWW has completed the strategic planning, development, and deployment of all hardware, software, and programming integration necessary to deliver carrier-grade telecommunication enablement services to the US MVNO market. PPWW systems represent a bi-directional hub between the carrier and each wholesale partner. PPWW published and manages a robust API architecture enabling real-time activations, customer management functions, and billing record delivery. PPWW is fully integrated into the carrier's ordering API platform. All wholesale partners integrate directly with PPWW.

PPWW's network is fully-redundant. This includes power, circuits, hardware, and network connections, and the network delivers 99.999% uptime and reliability. PPWW has deployed disaster recovery mechanisms that ensure talk, text, and data services remain available. PPWW systems are built for rapid deployment and support of wholesale clients. Operational support includes API integration, customer activations, rate plan management, customer life-cycle messaging, equipment warehouse and fulfillment, 24/7 call center services and Tier 2 technical

support. In addition, PPWW maintains subject matter, development, and innovation experts to engage and retain wholesale partners and subscribers.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in a combined twenty-nine (29) jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. Global Connection's current management team will remain with the Company, continuing to direct day-to-day oversight of the operations. This will ensure that their collective expertise in the telecommunications compliance field and specific in-depth knowledge of Global Connection will guide the Company's decisions going forward and its adherence to this Amended Compliance Plan. As a result, the transaction will bring together the full strength of Global Connection's proven telecommunications capabilities and the technical, managerial and financial expertise of Odin Mobile and its affiliates. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state. The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff.⁸⁰ Global Connection agreed to pay a civil penalty

⁸⁰ See *Order Adopting Consent Order*, Docket No. 9322, Document No. 133041 (Dec. 22, 2010), included as **Exhibit D**.

in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁸¹ Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁸² Global Connection's Lifeline supported voice services will meet the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated on an annual basis. Global Connection's Lifeline supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated on an annual basis. To the extent Global Connection provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and Global Connection will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

The Company provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include broadband Internet access service ("BIAS"), a supported service as of December 2, 2016, as well as voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's wireless service offerings included in Section II *supra* provide its customers with a set of minutes of use at no charge to the customer, and can be used for local and

⁸¹ Compliance Plan Public Notice at 3.

⁸² See 47 C.F.R. § 54.202(a)(1).

domestic toll service. The Company's wireline service offerings included in Section II *supra* provide its customers with unlimited minutes for local service, and can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compliance. As discussed above, the Company will comply with the Commission's applicable forbearance grant conditions relating to the provision of 911 and E911 services and handsets (when applicable).

Finally, Global Connection will not provide toll limitation service ("TLS") for its wireless service offering, which allows low-income consumers to avoid unexpected toll charges. The Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the 2012 Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁸³

The Company's Lifeline wireline offerings include unlimited local calling and plans include prepaid long distance minutes. All wireline customers can purchase additional domestic long distance—unlimited for \$10.00, or 250 minutes for \$5.00. Wireline customers are not permitted to make long distance calls beyond the minutes prepaid. Therefore, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes because customers are not permitted to exceed their long distance minutes. Global Connection's long distance vendor monitors and controls long-distance usage by end users and blocks long distance calling if the customer has not prepaid for such service.

⁸³ See 2012 Lifeline Reform Order ¶ 230.

IV. Conclusion

Global Connection submits that its Compliance Plan, as revised, fully satisfies the conditions set forth in the Commission's 2012 Lifeline Reform Order, the Compliance Plan Public Notice and the Lifeline rules. Timely approval of this amended Compliance Plan, as well as Global Connection's pending ETC Petition, as amended, is essential to allow Global Connection to consummate the ownership change as described herein, and demonstrably strengthen the Company's operating capabilities to the direct benefit of its Lifeline customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve the revisions to its Compliance Plan.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
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1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

Attorneys for Global Connection Inc. of America

February 22, 2017

Exhibit A

Model Application/Certification Form

A-1 Wireless

A-2 Wireline

A-1 Wireless

FREE
PHONE
500
100 TEXT
50MB DATA



Welcome and thank you
for your interest in being a
StandUP WirelessSM customer!



IMPORTANT INFORMATION PLEASE READ CAREFULLY



IDENTIFICATION



Please have your
state-issued ID
(drivers license or ID
card) ready to show at
sign-up.



PROOF OF ELIGIBILITY

If you participate in one of
these government
assistance programs or
earn 135% below the
Federal Poverty Limits or
less, you may be eligible
for the StandUP Wireless
Lifeline Program.



Medicaid



SNAP
Food Stamps



Supplemental
Security Income



Veterans and
Survivor
Pension



Housing
Assistance



PROTECT YOUR PERSONAL DATA



The privacy and security of your
personal information is very
important to us. Please be sure to
keep your personal information
private until needed for sign-up.
We do not share your personal
information in ways not disclosed
or without your authorization.



ACKNOWLEDGEMENT



You agree to have your
information submitted
electronically by a StandUP
Wireless Representative.
Please read the application
form on the reverse side that
you will be asked to sign
electronically upon
activation.



NON-USAGE & RECERTIFICATION POLICIES



You must place a call from your StandUP
Wireless phone, receive a call from
anyone other than StandUP or our
agents, place an outbound text or use
data once every 30 days to avoid
termination of service and
de-enrollment.

IF APPROVED THIS CERTIFICATION
WILL REMAIN ACTIVE FOR ONE (1)
YEAR AND MUST BE RECERTIFIED
ANNUALLY. PLEASE RETAIN FOR YOUR
RECORDS.



TOP-UP YOUR MINUTES OR PLAN

TOP-UP
YOUR MINUTES

FOR AS LOW AS
5¢
PER MINUTE

StandUP Rates:

MINUTES	PRICE
200	\$5.00
450	\$10.00
1000	\$20.00
1500	\$30.00
2500	\$50.00

*taxes and fees are extra.

ONLINE &
CUSTOMER CARE

www.StandUPWireless.com
1-800-544-4441

We accept



PAYMENT LOCATIONS



MoneyGram
ACE Cash Express
7870

STEP-UP YOUR PLAN

StandUP 500 BASIC
FREE
Reloads Every Month
• 500 Minutes
• 100 Text Units
• 50 MB Data

StandUP 500 DATA
ONLY \$9.75*
Per Month
• 500 Minutes
• 2000 Text Units
• 100 MB Data

StandUP 500 PREMIUM
ONLY \$12.20*
Per Month
• 500 Minutes
• 2000 Text Units
• 100 MB Data

StandUP UNLIMITED
ONLY \$27.20*
Per Month
• Unlimited Minutes
• Unlimited Text Units
• 500 MB Data

StandUP Non-Lifeline plans can also be purchased for the
stated price above plus \$12.75 per month.

Customers may contact their State Public Service or Public Utility Commission
with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities
Commission Consumer Affairs
303-894-2070 or
800-456-0858

Georgia Public Service
Commission's Consumer
Affairs Unit
404-656-4501 or
800-282-5813

Pennsylvania Utility Commission
Bureau of Consumer Services
800-692-7380 or for
TDD PA Relay Center 800-682-8706 (voice)
or 800-682-8786 (TTY)

Kansas Commission's Office
of Public Affairs
and Consumer Protection
785-271-3140 or 800-662-0027
TD 800-766-3777

Massachusetts Consumer Divisions
Dept. of
Telecommunications & Cable
617-305-3531 or 800-392-6066

THIS CERTIFICATION WILL REMAIN ACTIVE FOR ONE (1) YEAR AND MUST BE RECERTIFIED ANNUALLY. PLEASE RETAIN FOR YOUR RECORDS

IMPORTANT

LIFELINE
WIRELESS
SERVICE
INFORMATION:

Lifeline is a government assistance program. Only one Lifeline service is available per household. A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. Your household is not permitted to receive multiple Lifeline benefits whether they be from one or multiple companies. This includes wireline and wireless services. Lifeline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. You must use your phone to continue to receive service. Should you not use your service for 30 days, subject to a 15-day cure period during which you may use your service, you will be de-enrolled. Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits. Eligible Lifeline Subscribers will receive a free handset with calling features and receive 500 Anytime Minutes, 100 SMS, and 50 MB of data each month of service OR receive a discount from any premium plan.

LIFELINE ELIGIBILITY CRITERIA

Supplemental Nutrition Assistance
Program (SNAP) (Food Stamps);
Supplemental Security Income
(SSI); Federal Public Housing
Assistance (Section 8); Veteran
Pension and Survivors Benefit;
Medicaid; AZ, AR, CA, CO, GA, IA,
KS, KY, LA, MA, MD, MI, MN, MO, NE,
OH, PA, RI, SC, TX, UT, WI, PR, WV

Please check your eligibility on the list below

Additional State
Programs may
apply in:
CA, MI, WI, UT,

150% of Federal Poverty
Guidelines or Below; CA, MI

135% of Federal Poverty
Guidelines or Below: AR, AZ,
CO, GA, IA, KY, LA, MA, MD,
MN, NE, OH, PA, PR, RI, SC,
TX, UT, WV, WI, MO, KS

Global Connection Inc. of America
D/B/A StandUP Wireless

Tel: 1-800-544-4441 • Fax: 1-888-391-3995
P.O. Box 2148 Norcross, GA 30091

StandUP
WIRELESS

WIRELESS LIFELINE SERVICE
APPLICATION AND CERTIFICATION

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by the Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ I hereby certify, under penalty of perjury, that I understand the disclosures listed above, and that to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

OR

☐ I hereby certify, under penalty of perjury, that I understand the disclosures listed above, and that I am receiving Lifeline benefits from another carrier; however, with this application I would like to transfer my benefits to StandUP Wireless. I understand the change will change my existing mobile number.

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs (check one):

- | | |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Veteran's and Survivors Pension Benefit |
| <input type="checkbox"/> Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> State Eligibility Program (WI, MI, and UT only) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | |

Customer Application Information:

First Name _____ Middle Name _____ Last Name _____

Date of Birth: Month: _____ Day: _____ Year: _____ Last Four Digits of Social Security Number or Tribal ID Number: _____

If Qualifying for Lifeline by Income, number of Individuals in Household: _____ Home Telephone Number (if available) : _____

Residential Address (P.O. Box NOT sufficient) Address is (choose one): ☐ Permanent ☐ Temporary Contact Number _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Billing Address (if different from Residential Address) (P.O. Box IS sufficient) Email: _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Multiple households sharing an address:

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling 611. To keep your account active, you must use your Lifeline service at least once during any 30 day period by completing an outbound call or text message, using your data plan, purchasing additional minutes or data from the Company, answering an inbound call from someone other than the Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service. If your service goes unused for 30 days, subject to a 15-day cure period during which you may use your service, you will no longer be eligible for Lifeline benefits and your service will be deactivated (allowing only 911 calls and calls to the Company's customer care center).

☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (name, telephone number, address, DOB, last four digits of SSN or Tribal ID number, amount of support sought, means of qualifications, dates of service initiation/termination), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

If Qualifying person is different:

Name of qualifying individual _____

☐ The individual named on the documentation you provided to demonstrate eligibility is part of your household and does not already receive Lifeline benefits.

Additional certifications: I hereby certify, under penalty of perjury, that (Initial and check the box next to each line):

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required.
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement.
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60).
- ☐ The address listed above is my primary residence, not a second home or business.
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days.
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits.
- ☐ The information contained in this certification form is true and correct to the best of my knowledge.
- ☐ If I am subject to a benefit port freeze with another Lifeline provider and I am transferring my benefit to StandUP Wireless pursuant to an exception to the benefit port freeze, I understand that I am not required to provide proof of eligibility for Lifeline until the end of my port freeze, but I consent to providing such proof to StandUP Wireless at this time.

Applicant's Signature: _____

Date: _____

FOR AGENT USE ONLY (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility (check 1):

- | | | | |
|--|--|---|---|
| <input type="checkbox"/> The prior year's state, federal, or Tribal tax return, | <input type="checkbox"/> A Veterans Administration statement of benefits, | <input type="checkbox"/> Federal or Tribal notice letter of participation in General Assistance, or | If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months. |
| <input type="checkbox"/> Current income statement from an employer or paycheck stub, | <input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits, | <input type="checkbox"/> A divorce decree, child support award, or other official document. | |
| <input type="checkbox"/> A Social Security statement of benefits, | | | |

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Veterans and Survivors Pension Benefit
- ☐ State Eligibility Program (WI, MI, and UT only)

List B - Choose 1:

- ☐ Program participation card/document
- ☐ Prior year's statement of benefits
- ☐ Notice letter of participation
- ☐ Other official document evidencing participation _____

Last 4 digits of Doc / ID# from List B _____

Date of Proof Document: _____

Expiration Date of Proof Document: _____

Applicant
Account
Number: _____

Agent/Dealer
Number: _____

A-2 Wireline

Global Connection Inc. of America

Tel: 1-877-511-3009 • Fax: 1-888-878-9323
P.O. Box 1187 Norcross, GA 30091



WIRELINE LIFELINE SERVICE APPLICATION AND CERTIFICATION



A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☐ I hereby certify, under penalty of perjury, that I have read and understand the disclosures listed above, and that to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

OR

☐ I hereby certify, under penalty of perjury, that I have read and understand the disclosures listed above, and that I am receiving Lifeline benefits from another carrier; however, with this application I would like to transfer my benefits to Global Connection Inc. of America. I understand the change will change my existing phone number.

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs (check one):

- | | | |
|---|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Federal Veteran's and Survivors Pension Benefit | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)(MI and CA only) |
| <input type="checkbox"/> Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines (except for MI and CA) | <input type="checkbox"/> Low Income Heat and Energy Assistance (LIHEAP)(MI and CA only) |
| <input type="checkbox"/> Medicaid (Not Medicare) | <input type="checkbox"/> Income at or below 150% of Federal Poverty Guidelines (CA and MI only) | <input type="checkbox"/> National Free School Lunch Program (CA and MI only) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | | |

Customer Application Information:

First Name _____ Middle Name _____ Last Name _____

Date of Birth: Month: _____ Day: _____ Year: _____ Last Four Digits of Social Security Number or Tribal ID Number: _____

If Qualifying for Lifeline by Income, number of Individuals in Household: _____ Home Telephone Number (if available) : _____

Residential Address (P.O. Box NOT sufficient) _____ Address is (choose one): ☐ Permanent ☐ Temporary _____ Contact Number _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Billing Address (if different from Residential Address) (P.O. Box IS sufficient) _____ Email: _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Multiple households sharing an address:

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses.

☐ **Letter of Authorization:** This letter is a written authorization, to designate Global Connection Inc. of America to act as my agent in order to change the following: long distance carrier from my current telecommunications carrier to Global Connection Inc. of America long distance service, local exchange carrier from my current telecommunications carrier to Global Connection Inc. of America, I am authorized to request changes on this account. I further understand that there may be a charge for each provider change and could involve a charge for the changing back to the original primary carrier. Subscribers selecting the electronic signature option and or the IVR (Interactive Voice Response) to be considered a "writing", any name or symbol of subscriber affixed to or contained in the electronic Letter of Authorization shall be deemed to be the Subscriber's valid signature expressing intent to be bound to this Letter of Authorization and the applicable tariffs.

Authorizations:

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (name, telephone number, address, DOB, last four digits of SSN or Tribal ID number, amount of support sought, means of qualifications, dates of service initiation/termination), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

If Qualifying person is different :

Name of qualifying individual (if different than applicant; if different see Additional Certifications): _____

☐ The individual named on the documentation you provided to demonstrate eligibility is part of your household and does not already receive Lifeline benefits.

Additional certifications. I hereby certify, under penalty of perjury, that (initial and check the box next to each line):

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required.
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement.
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60).
- ☐ The address listed is my primary residence, not a second home or business.
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days.
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits.
- ☐ The information contained in this certification form is true and correct to the best of my knowledge.
- ☐ If I am subject to a benefit port freeze with another Lifeline provider and I am transferring my benefit to Global Connection pursuant to an exception to the benefit port freeze, I understand that I am not required to provide proof of eligibility for Lifeline until the end of my port freeze, but I consent to providing such proof to Global Connection Inc. of America at this time.

Applicant's Signature:

Date: _____

FOR AGENT USE ONLY (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility (check 1):

- | | | | |
|--|--|---|---|
| <input type="checkbox"/> The prior year's state, federal, or Tribal tax return, | <input type="checkbox"/> A Veterans Administration statement of benefits, | <input type="checkbox"/> Federal or Tribal notice letter of participation in General Assistance, or | If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months. |
| <input type="checkbox"/> Current income statement from an employer or paycheck stub, | <input type="checkbox"/> A retirement/pension statement of benefits | <input type="checkbox"/> A divorce decree, child support award, or | |
| <input type="checkbox"/> A Social Security statement of benefits, | <input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits, | <input type="checkbox"/> other official document. | |

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

- | | | | |
|---|---|--|--|
| List A - Choose 1
<input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)
<input type="checkbox"/> Medicaid
<input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA)
<input type="checkbox"/> Supplemental Security Income (SSI)
<input type="checkbox"/> Federal Veterans and Survivors Pension Benefit | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)(MI and CA only)
<input type="checkbox"/> Low Income Heat and Energy Assistance (LIHEAP)(MI and CA only)
<input type="checkbox"/> National Free School Lunch Program (CA and MI Only) | List B - Choose 1:
<input type="checkbox"/> Program participation card/document
<input type="checkbox"/> Prior year's statement of benefits
<input type="checkbox"/> Notice letter of participation
<input type="checkbox"/> Other official document evidencing participation _____ | Last 4 digits of Doc / ID# from List B _____
Date of Proof Document: _____/_____/_____
Expiration Date of Proof Document: _____/_____/_____ |
|---|---|--|--|

Applicant Account Number: _____

Agent/Dealer Number: _____

Exhibit B

Income Eligibility Worksheet

B-1 Wireless

B-2 Wireline

B-1 Wireless

Lifeline Federal Poverty Limit Guidelines

Qualifying individuals are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

**Excluding CA. & MI

HOUSEHOLD SIZE	INCOME LEVEL
1	\$16,281
2	\$21,924
3	\$27,567
4	\$33,210
5	\$38,853
6	\$44,496
7	\$50,139
8	\$55,782
For each additional person, add	\$5,643

Effective 1-31-2017

Applicants must list the number of individuals in the applicant's household on the Lifeline application form. Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- The prior year's state, federal, or Tribal tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A Veterans Administration statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support award, or other official document
- If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months

This is a Lifeline service provided by Global Connection Inc. of America. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.

IMPORTANT

LIFELINE WIRELESS SERVICE INFORMATION:

Lifeline is a government assistance program. Only one Lifeline service is available per household. A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. Your household is not permitted to receive multiple Lifeline benefits whether they be from one or multiple companies. This includes wireline and wireless services. Lifeline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. You must use your phone to continue to receive service. Should you not use your service for 30 days, subject to a 15-day cure period during which you may use your service, you will be de-enrolled. Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits. Eligible Lifeline Subscribers will receive a free handset with calling features and receive 500 Anytime Minutes, 100 SMS, and 50 MB of data each month of service OR receive a discount from any premium plan.

LIFELINE ELIGIBILITY CRITERIA

Please check your eligibility on the list below

Program Eligibility : Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Veteran Pension and Survivors Benefit; Medicaid

Additional State Programs may apply in: CA, MI

Income Eligibility :135% of Federal Poverty Guidelines or Below, except for :

150% of Federal Poverty Guidelines or Below; CA, MI

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities Commission
Consumer Affairs at
303-894-2070 or
800-456-0858

Georgia Public Service Commission's
Consumer Affairs
Unit at 404-656-4501
or 800-282-5813

Kansas Commission's
Office of Public Affairs
and Consumer
Protection at
785-271-3140 or
800-662-0027
TDD 800-766-3777

Massachusetts
Consumer Division
Dept. of
Telecommunications &
Cable 617-305-3531 or
800-392-6066

B-2 Wireline

Lifeline Federal Poverty Limit Guidelines

Qualifying individuals are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines.** This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

**Excluding CA. & MI

HOUSEHOLD SIZE	INCOME LEVEL
1	\$16,281
2	\$21,924
3	\$27,567
4	\$33,210
5	\$38,853
6	\$44,496
7	\$50,139
8	\$55,782
For each additional person add:	\$5,643

Effective 1-31-2017

Applicants must list the number of individuals in the applicant's household on the Lifeline application form. Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- The prior year's state, federal, or Tribal tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A Veterans Administration statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support award, or other official document
- If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months

IMPORTANT

Lifeline is a government assistance program. Only one Lifeline service is available per household. A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. Your household is not permitted to receive multiple Lifeline benefits whether they be from one or multiple companies. This includes wireline and wireless services. Lifeline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits.

LIFELINE WIRELINE SERVICE INFORMATION:

LIFELINE ELIGIBILITY CRITERIA

Please check your eligibility on the list below

Program Based Eligibility:
Supplemental Nutrition Assistance Program (SNAP) (Food Stamps)
Supplemental Security Income (SSI)
Federal Public Housing Assistance (Section 8)
Veteran Pension and Survivors Benefit
Medicaid
Additional State Programs may apply in CA and MI

Income Based Eligibility

Income at or below 135% of Federal Poverty Limits
Separate guidelines apply in CA and MI

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public
Utilities
Commission
Consumer Affairs
at 303-894-2070
or 800-456-0858

Georgia Public
Service
Commission's
Consumer Affairs
Unit at 404-656-4501
or 800-282-5813

Kansas Commission's
Office of Public Affairs
and Consumer
Protection at
785-271-3140 or
800-662-0027

Massachusetts Consumer
Division Dept. of
Telecommunications &
Cable 617-305-3531 or
800-392-6066

Exhibit C

Marketing Materials

C-1 Wireless

C-2 Wireline

C-1 Wireless

StandUP
WIRELESS



FREE*

CELL PHONE
& FREE ACTIVATION

500

**ANYTIME
MINUTES**

**EACH MONTH.
EVERY MONTH.**

100 Text Message + **50** MB of Data

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning

Colorado Public Utilities
Commission Consumer
Affairs at 303-894-2070
or 800-456-0858

Georgia Public Service
Commission's Consumer
Affairs Unit at
404-656-4501 or
1-800-282-5813

Pennsylvania Utility
Commission - Bureau of
Consumer Services
800-692-7380 or for TDD
PA Relay Center
800-682-8706(Voice)
800-682-8786(TTY)

Kansas Commission's
Office of Public Affairs
and Consumer
Protection 785-271-3140
or 800-662-0027 or
TDD 800-766-3777

Massachusetts Consumer
Division Dept. of
Telecommunications &
Cable 617-305-3531 or
800-392-6066

Global Connection Inc. of America d/b/a/ StandUP Wireless

1-800-544-4441
www.StandUPWireless.com



StandUP
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FREE*

CELL PHONE
FREE MINUTES & TEXTS

See reverse for more info!

Actual
handset
may vary,
subject to
availability.



Broch: Cell Prosp Sml 500 GEN REV14 01-04-17

PLEASE BRING A STATE ID AND PROOF OF ELIGIBILITY

**GET YOUR
FREE PHONE
TODAY!**

LIFELINE ELIGIBILITY CRITERIA

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Veteran Pension and Survivors Benefit; Medicaid; AZ, AR, CA, CO, GA, IA, KS, KY, LA, MA, MI, MN, MO, NE, OH, PA, RI, SC, TX, UT, WI, PR, WV

Please check your eligibility on the list below

Additional State Programs may apply in:
CA, MI, WI, UT

150% of Federal Poverty Guidelines or Below; CA, MI
135% of Federal Poverty Guidelines or Below; AR, AZ, CO, GA, IA, KY, LA, MA, MN, MD, NE, OH, PA, PR, RI, SC, TX, UT, WV, WI, MO, KS

IMPORTANT

LIFELINE WIRELESS SERVICE INFORMATION:

Lifeline is a government assistance program. Only one Lifeline service is available per household. A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. Your household is not permitted to receive multiple Lifeline benefits whether they be from one or multiple companies. This includes wireline and wireless services. Lifeline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. You must use your phone to continue to receive service. Should you not use your service for 30 days, subject to a 15-day cure period during which you may use your service, you will be de-enrolled. Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits. Eligible Lifeline Subscribers will receive a free handset with calling features and receive 500 Anytime Minutes, 100 SMS, and 50 MB of data each month of service OR receive a discount from any premium plan.

C-2 Wireline

SEE
STORE AGENT
TO
SIGN UP NOW!

SAY HELLO TO REAL HOME PHONE BIG \$SAVINGS\$

If you receive Government supported services,
you may be eligible for a Lifeline Discount on your home telephone service.

We proudly accept Global Connection
Real Home Phone Service payments

1-877-511-3009

hablamos español

- ✔ Unlimited Local Calls
- ✔ Great Plans
- ✔ No Credit Check
- ✔ No Contract
- ✔ No Deposit



*Restrictions apply. See representative for details.



Customers may contact their State Public Service or
Public Utility Commission with any unresolved
questions or complaints concerning Lifeline services:

Colorado Public
Utilities Commission
Consumer Affairs at
303-894-2070 or
800-456-0858

Georgia Public Service
Commission's Consumer
Affairs Unit at
404-656-4501 or
1-800-282-5813

Kansas Commission's
Office of Public Affairs and
Consumer Protection at
785-271-3140 or
800-662-0027

Massachusetts Consumer
Division Dept. of Telecommuni-
cations & Cable 617-305-3531 or
800-392-6066

IMPORTANT LIFELINE WIRELINE SERVICE INFORMATION:

Lifeline is a government assistance program. Only one Lifeline service is available per household. A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. Your household is not permitted to receive multiple Lifeline benefits whether they be from one or multiple companies. This includes wireline and wireless services. Lifeline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits.

LIFELINE ELIGIBILITY CRITERIA

You may qualify if you participate in any of the following programs:

Supplemental Nutrition Assistance Program (SNAP)
(Food Stamps)
Supplemental Security Income (SSI)
Federal Public Housing Assistance (Section 8)
Medicaid
Federal Veteran's and Survivor Pension Benefit

You may qualify if you:

Income is at or below 135% of
Federal Poverty Guidelines (except
for MI and CA)
Income at or below 150% of Federal
Poverty Guidelines (CA and MI only)

Please check your eligibility on the list below

You may qualify if you participate in the following programs:

Temporary Assistance for Needy Families
(TANF) (MI and CA only)
Low Income Heat and Energy Assistance
(LHEAP) (MI and CA only)
National Free School Lunch Program (CA and MI
Only)

**Real
HOME
PHONE
SERVICE™**
www.RealHomePhone.com

Service provided by Global Connection Inc. of America

Exhibit D

Georgia Public Service Commission Order

COMMISSIONERS:

LAUREN "BUBBA" McDONALD, JR., CHAIRMAN
STAN WISE
ROBERT B. BAKER, JR.
CHUCK EATON
H. DOUG EVERETT



FILED

DEC 28 2010

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

EXECUTIVE SECRETARY
G.P.S.C. REECE McALISTER
EXECUTIVE SECRETARY

Georgia Public Service Commission

(404) 656-4501
(800) 282-5813

244 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334-5701

FAX: (404) 656-2341
www.psc.state.ga.us

DOCKET# 9322
DOCUMENT# 133041

Docket No. 9322

**IN RE: Application of Global Connection, Inc. for Certificate of Authority to
Provide Local Exchange Service**

ORDER ADOPTING CONSENT ORDER

This matter comes before the Georgia Public Service Commission ("Commission") to consider the proposed Consent Order (Attachment "A") between the Commission Staff and Global Connection, Inc. ("Global Connection").

JURISDICTION

1.

Global Connection holds the following certificates from the Georgia Public Service Commission: Competitive Local Exchange Carrier Certificate of Authority, L-091, and Resale Certificate of Authority, R-0576.

2.

Global Connection is a "telecommunications company" as that term is defined under O.C.G.A. § 46-5-162(17).

3.

The Commission has general authority and jurisdiction over telecommunications companies pursuant to Georgia's Telecommunications and Competition Development Act of 1995 ("Telecom Act"), O.C.G.A. §§ 16-5-160 through 174, and generally O.C.G.A. §§ 46-1-1 through 5, 46-2-20, 46-2-21 and 46-2-23. In addition, upon a finding that a company subject to its jurisdiction willfully violates any law it administers or any duly promulgated regulation issued thereunder, or fails, neglects, or refuses to comply with any duly noticed order it issues, the Commission may assess a civil penalty not to

exceed \$15,000.00 for such violation and an additional penalty not to exceed \$10,000.00 for each day during which such violation continues. O.C.G.A. § 46-2-91(a).

Background

1.

On August 25, 2010, Global Connection filed an Application for Approval of Eligible Telecommunications Company Status. In the course of its review of Global's application, the Commission Staff discovered three violations of Georgia law and Commission orders. These violations are detailed in the Consent Order that is attached as Exhibit A to this Order. A summary of these violations is provided below.

2.

From its investigation, the Commission Staff found that, for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund.

3.

Staff also determined that Global Connection charged a late fee in excess of the amount permitted in its Commission-approved tariff to an estimated 5,500 customers in Georgia.

4.

Finally, Staff determined that, beginning in or before July, 2008, the customer bills issued by Global Connection included a processing fee associated with switching carriers or terminating service that was inconsistent with the provisions of its Commission-approved tariff.

5.

To resolve these violations, Global Connection entered into a Consent Order with the Commission Staff in which it agreed to pay a civil penalty in the amount of \$55,000.00. Under the terms of the Consent Order, Global Connection shall pay no less than \$18,334.00 by the first business day of January 2011. For each of the two months thereafter, Global Connection shall make an additional payment to the Commission on the first of the month in the amount of \$18,333.00. Global Connection may, at its sole option, pay the balance due at any time before March 1, 2011.

6.

Also, to resolve these violations, beginning with its next billing cycle, Global Connection agreed to make the modifications to its customer bills that are necessary to comply with the Commission-approved tariff.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1.

After considering the proposed Consent Order, the Commission finds and concludes that the terms and conditions of the Stipulation are reasonable. The Commission finds that the amount of the civil penalty is reasonable, in light of the totality of the facts set forth in the Consent Order. The appropriate amount of a civil penalty involves judgment, and may be specific to the facts of the particular case. The penalty provided for in the Consent Order is sufficient to preserve the integrity of the Commission's rules, orders and administration of Georgia law.

2.

The record in this case shows that for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund ("UAF"). (Consent Order, ¶ 6). This action violates O.C.G.A. § 46-5-167(g), which provides that "A local exchange company or other company shall not establish a surcharge on customers' bills to collect from customers' contributions [to the UAF]." The Commission administers this statute. O.C.G.A. §§ 46-5-162(4) and 46-5-167.

3.

The record also shows that Global Connection recovered from an estimated 5,500 customers a late penalty of \$10.00. (Consent Order, ¶¶ 8, 10). The Commission-approved tariff sets a maximum late penalty of 1.5 percent of the past due amounts. *Id.* at ¶ 7. The monthly charge for Global Connection's service is approximately \$50.00. *Id.* at ¶ 9. The Commission finds that the late fee Global Connection recovered from these customers exceeded the late fee set forth in the Company's applicable tariff provision. The Commission approved this tariff; therefore, Global Connection's actions violated what is, in effect, an order of the Commission.

4.

Finally, the facts show that Global Connection's customer bills stated that a \$25.00 processing fee applied in the event that a customer switched to another carrier or disconnected service. (Consent Order, ¶ 12). However, Section 2.13 of Global Connection's Commission-approved local service tariff does not authorize the imposition of this processing fee in those instances in which a customer cancels service after service has been installed. The Commission concludes that the customer bills do not comply with the applicable tariff provision. The Commission approved this tariff; therefore, Global Connection's actions violated what is, in effect, an order of the Commission.

5.

The Commission also finds that it is reasonable to require Global Connection to modify its customer bills to comply with the Commission-approved tariff beginning with the next billing cycle.

WHEREFORE IT IS ORDERED, that the Commission hereby adopts as an Order of this Commission, the Consent Order signed by the Commission Staff and Global Connection dated December 13, 2010, and attached as "Exhibit A" to this Order.

ORDERED FURTHER, that all findings, conclusions, statements, and directives made by the Commission and contained in the foregoing sections of this Order are hereby adopted as findings of fact, conclusions of law, statements of regulatory policy, and orders of this Commission.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 21st day of December, 2010.



Reece McAlister
Executive Secretary



Lauren "Bubba" McDonald, Jr.
Chairman

12-22-10
Date

12-22-10
Date

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

FILED

DEC 13 2010

**IN RE: Application of Global Connection, Inc. for Certificate of Authority to
 Provide Local Exchange Service**

**EXECUTIVE SECRETARY
G.P.S.C.**

CONSENT ORDER

The Staff of the Georgia Public Service Commission and Global Connection, Inc. ("Global Connection") hereby agree to present the following proposed disposition of the violations detailed herein to the Commission.

BACKGROUND AND LEGAL AUTHORITY

1.

Global Connection holds the following certificates from the Georgia Public Service Commission: Competitive Local Exchange Carrier Certificate of Authority, L-091, and Resale Certificate of Authority, R-0576.

2.

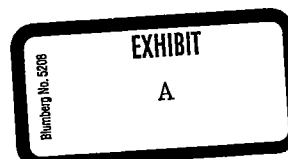
Global Connection is a "telecommunications company" as that term is defined under O.C.G.A. § 46-5-162(17).

3.

The Commission has general authority and jurisdiction over telecommunications companies pursuant to Georgia's Telecommunications and Competition Development Act of 1995 ("Telecom Act"), O.C.G.A. §§ 16-5-160 through 174, and generally O.C.G.A. §§ 46-1-1 through 5, 46-2-20, 46-2-21 and 46-2-23. In addition, upon a finding that a company subject to its jurisdiction willfully violates any law it administers or any duly promulgated regulation issued thereunder, or fails, neglects, or refuses to comply with any duly noticed order it issues, the Commission may assess a civil penalty not to exceed \$15,000.00 for such violation and an additional penalty not to exceed \$10,000.00 for each day during which such violation continues. O.C.G.A. § 46-2-91(a).

4.

On August 25, 2010, Global Connection filed an Application for Approval of Eligible Telecommunications Company Status. In the course of its review of Global's application, the Commission Staff discovered three violations of Georgia law and Commission orders.



5.

Pursuant to the Telecom Act, the Commission created a Universal Access Fund “to assure the provision of reasonably priced access to basic local exchange services throughout Georgia.” O.C.G.A. § 46-5-167(a). All certified telecommunications companies in Georgia are required to make quarterly contributions to the fund. O.C.G.A. § 46-5-167(b). Companies are prohibited from establishing a surcharge on customers’ bills to collect this contribution from customers. O.C.G.A. § 46-5-167(g).

6.

From its investigation, the Commission Staff found that, for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund. This action by Global Connection violated O.C.G.A. § 46-5-167(g).

7.

Section 2.15 of Global Connection’s Commission-approved local service tariff is entitled “Late Payment Charge.” This section states that “Invoices more than thirty (30) days past due will incur a monthly finance charge on the unpaid balance at a rate equal to the lesser of one and one-half percent (1.5%) per month or the maximum rate permitted by applicable Regulation.”

8.

The Commission Staff found that, for at least the time period of July, 2008 through August 2010, bills issued by Global Connection to its customers in Georgia stated that “[a] \$10.00 Late Fee Will Be Applied to Accounts When Payment Is Not Posted By Due Date.”

9.

The monthly charge a customer receiving local telecommunications service from Global Connection is approximately \$50.00. Therefore, the late fee that Global Connection included on its customer bills significantly exceeded the late fee permitted pursuant to its Commission-approved tariff.

10.

Based on discovery responses and discussions between Staff and Global Connection, the parties estimate that Global Connection collected the excessive late fee from about 5,500 customers in Georgia.

11.

Section 2.13 of Global Connection’s Commission-approved local service tariff states that “Customers who cancel a Service Order prior to Service installation (including without limitation cancellation of special construction or Services provided on an individual case basis will incur a

charge equal to the greater of (i) the non-recurring charges for the MSP, or (ii) the company's reasonably incurred, actual expenses associated with such cancellation."

12.

Beginning in or before July, 2008, Global Connection's bills issued by Global Connection to its customers in Georgia stated that "If this invoice is **PAID IN FULL**, [Global Connection] will issue a refund in the event of switching to another carrier or disconnection occurs prior to Bill Due Date, **minus a \$25 processing fee.**" (emphasis in original).

13.

Global Connection's Commission-approved local service tariff does not authorize the imposition of the processing fee described in paragraph 12 in those instances in which a customer cancels service after service has been installed. Therefore, the customer bills do not comply with the Commission-approved tariff.

AGREEMENT

The parties to this Consent Agreement are desirous of resolving this matter and believe that it is in the public interest to do so under the terms and conditions described herein. The undersigned parties hereby agree that this matter should be disposed of as follows:

1.

This Consent Agreement, if approved by the Commission, shall constitute a Final Order resolving the violations discussed herein. The parties agree that they will abide by the terms of the Consent Agreement.

2.

The Consent Agreement shall not become effective until approved without modification by the Commission. This Consent Agreement shall be void and of no effect whatsoever if it is not approved in its entirety by action of the Commission.

3.

Global Connection agrees to pay to the Commission in certified funds a civil penalty in the amount of \$55,000.00. Global Connection shall pay no less than \$18,334.00 by the first business day of January 2011. For each of the two months thereafter, Global Connection shall make an additional payment to the Commission on the first of the month in the amount of \$18,333.00. Global Connection may, at its sole option, pay the balance due at any time before March 1, 2011.

4.

Beginning with its next billing cycle, Global Connection shall make the modifications to its customer bills that are necessary to comply with the Commission-approved tariff.

5.

By entering into this Consent Agreement, Global Connection does not waive any notice, right, hearing, claim or defense with regard to any future action brought against it by the Commission or by any other person.

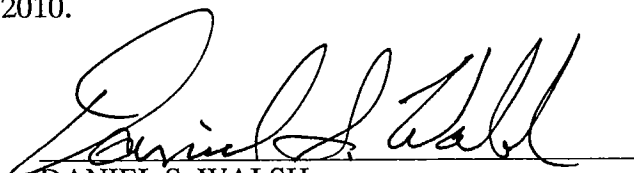
6.

Nothing in this Consent Agreement shall be construed to relieve Global Connection from its responsibility to comply with the terms and conditions of its Certificates of Authority, the rules and regulations of the Commission, and the laws of the State of Georgia.

7.

Each of the undersigned acknowledges that he has read this Consent Agreement and understands its contents. Each of the undersigned acknowledges that the party he or she represents freely, knowingly and voluntarily enters into this consent Agreement. Each of the undersigned parties hereby consents to the resolution of this proceeding as provided.

Agreed to this 13th day of December 2010.


DANIEL S. WALSH
Senior Assistant Attorney General


GLOBAL CONNECTION, INC.